

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff,**

Vs.

No. 2:22-cr-20104

**ASHLEY GRAYSON,
Defendant.**

MOTION FOR MODIFICATION OF RELEASE CONDITIONS

COMES NOW the Defendant, by and through her counsel of record, CLAIBORNE H. FERGUSON, and hereby requests that the conditions of her release be modified (alone with her husband's living arraignments) and for cause would state:

That the Magistrate judge set the following conditions, as they requested: That the should live and abode in Dallas, Texas (the Northern District of Texas). At that time, Ms. Grayson was pregnant and needed to be near her doctors. The Release Order spelled this condition out as "travel and living is restricted to the Western District of Tennessee and Northern District of Texas without the prior approval of the Pretrial Services Office." Since the baby has been born, the defendants wish to return to their North Carolina residence, which is where the majority of the baby items are located. I instructed them to check with pretrial in Texas. Because of the use of the language "restricted" and "without the prior approval"¹ the pretrial services officer in Texas does not feel comfortable granting the request without approval from this Court.


The Home Address is: 7292 Three Sisters Lane Concord, NC 28027.

¹ Order Setting Conditions of Release. Doc 11, PageID 11.

The Government does not object to this request.

Respectfully, the parties request that the conditions of release be modified to allow for them to live in North Carolina.

Respectfully submitted,

The
CLAIBORNE  FERGUSON
Law Firm, P.A.
294 Washington Avenue
Memphis, Tennessee 38103
(901) 529-6400

/s/ Claiborne H. Ferguson
Claiborne H. Ferguson (BPR 20457)
Attorney for Defendant
claiborne101@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of July, 2023, I served a true and correct copy of the foregoing upon the person(s) listed below by the following method(s) of service:

- ☐ Depositing it in the U.S. mail, first class postage prepaid and properly addressed;
- ☐ Hand delivery;
- ☐ Facsimile transmission
- ☒ Electronic Transmission - PACER

/s/ Claiborne H. Ferguson

